

1 TERRY KEARNEY, State Bar No. 160054
2 LISA K. NGUYEN, State Bar No. 244280
3 LILLY T. FANG, State Bar No. 286105
4 W. RILEY LOCHRIDGE, State Bar No. 288042
5 CHRISTOPHER M. REILLY, State Bar No. 288419
6 LATHAM & WATKINS LLP
7 140 Scott Drive
8 Menlo Park, California 94025
9 Telephone: 650.328.4600
10 Facsimile: 650.463.2600
11 Email: penzatolitigation.lwteam@lw.com

12 LINDA M. INSCOE, State Bar No. 125194
13 TIMOTHY P. CRUDO, State Bar No. 143835
14 VANESSA C. WU, State Bar No. 274336
15 LATHAM & WATKINS LLP
16 505 Montgomery Street, Suite 2000
17 San Francisco, CA 94111
18 Telephone: 415.391.0600
19 Facsimile: 415.395.8095
20 Email: penzatolitigation.lwteam@lw.com

21 CINDY LIOU, State Bar No. 252161
22 KHANH NGUYEN, State Bar No. 253473
23 ASIAN PACIFIC ISLANDER LEGAL OUTREACH
24 1121 Mission Street
25 San Francisco, CA 94103
26 Telephone: 415.567.6255
27 Facsimile: 415.567.6248
28 Email: cliou@apilegaloutreach.org

16 Attorneys for Plaintiff
17 JANE DOE

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 JANE DOE,

CASE NO. 3:10-CV-05154-MEJ-DMR

22 Plaintiff,

PLAINTIFF'S MOTION TO LIFT STAY

23 v.

24 GIUSEPPE PENZATO, an individual; and
25 KESIA PENZATO, an individual,

26 Defendants.

On July 22, 2011, the Court entered a stay in this matter pending a criminal proceeding initiated against Defendants pursuant to Title 18 U.S.C. § 1595(b). A judgment was entered in that criminal proceeding on May 23, 2013, and that case has now been terminated. Accordingly, Plaintiff Jane Doe respectfully moves the Court to lift the stay entered in this matter.

5 Plaintiff has met and conferred with the Defendants. Defendants oppose this motion.

6

7

8 | Dated: October 2, 2013

Respectfully submitted,

9

11

12

13

14

15

16

17

18

10

2

—

20

27

By /s/ Terry Kearney
TERRY KEARNEY
Attorney for Plaintiff
JANE DOE